

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

THRU: Clair Fancy *[Signature]*
Al Linero *[Signature]* 8/12

FROM: Cleve Holladay *[Signature]*

DATE: August 12, 1997

SUBJECT: Kissimmee Utility Authority (KUA) Compliance Testing Modification

I have attached a permit modification which modifies compliance testing requirements for KUA's Cane Island Facility. The modification makes the following changes: 1) compliance with the nitrogen oxide emission limit will be demonstrated by using nitrogen oxide emission data collected during the annual Relative Accuracy Test Audit (RATA) testing, 2) removes the requirement for annual testing for particulate matter, sulfuric acid mist and VOC, 3) specifies that measured NO_x emissions shall not be ISO corrected for comparison with the BACT standard, 4) excess emissions will be reported semiannually using data collected by the continuous emissions monitors and 5) monitoring of water: fuel and fuel-bound nitrogen is waived as long as KUA follows excess emissions reporting procedures which are at least as stringent as or are more stringent than the NSPS.

We consulted with Dave McNeal of EPA who agreed that the procedure is more stringent than the NSPS requirement. He said that it was not necessary to send a letter to EPA and instructed us to follow the attached guidance provided by EPA on a similar determination in New York State.

This modification was public noticed on October 6, 1997. I recommend your approval and signature.